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October 29, 2013

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: *Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200, *Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources*, *Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules*

Dear Ms. Dortch:

On October 25, 2013, Brendan Kasper and Ed Mulligan, of Vonage, and Kristine Devine and the undersigned, of Wiltshire & Grannis LLP, met with Bill Dever and Ann Stevens and, via teleconference, with Lisa Gelb and Melissa Kinkel, all of the Wireline Competition Bureau, to discuss Vonage's progress in its trial of direct access to numbers.

During the meeting, Vonage discussed certain specifics of its numbering trial, including details related to the Alpha and Beta stages of its trial, which were initially described in its Numbering Proposal.¹ During the Alpha stage, Vonage provisioned test numbers and performed inbound PSTN-to-Vonage routing tests; during the Beta stage, Vonage tested porting from underlying carriers to the Vonage OCN. Vonage noted that it allowed a full 30 days for the Alpha and Beta stage testing before moving to the production phase of the trial.

Vonage then discussed the production phase of its trial, which began on October 1. In the first two weeks of that phase, Vonage ported approximately 7,500 total numbers in the Atlanta

¹ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97 *et al.*, at 3 (filed May 17, 2013) ("Numbering Proposal").

and Boston markets. Vonage continues to port numbers in Atlanta and Boston and informed staff that, in the week preceding the meeting, Vonage had ported 45,000 numbers, for a total of approximately 80,000 customers being served by directly held numbers in those two markets. As of October 25, Vonage had also provisioned approximately 650 new numbers for new subscribers, representing an expected increase over the 572 new numbers it reported in its third numbering report.² Vonage confirmed that it has had no trial-related problems with porting and that ports are being completed within the expected timeframe.

Vonage described its experience working with AT&T and Verizon in Atlanta and Boston, including the procedures it has put into place for porting and routing in those markets. Vonage told the Commission that the trial is proceeding as planned and that Vonage is on track to have ported approximately 115,000 numbers at the end of the five week production phase of the trial. Vonage also noted that, though the trial was designed to test technical issues related to routing, porting, and intercarrier compensation flow, it has also had a positive impact on Vonage's efforts to negotiate IP-to-IP interconnection agreements with carriers and MSOs.

Vonage then discussed its experiences in the Phoenix market. As noted in its prior two numbering trial reports,³ Vonage has not begun its trial in Phoenix because of difficulties coming to an agreement with CenturyLink to ensure proper routing of PSTN traffic to Vonage-held numbers.

Vonage's plan to handle inbound traffic is to use its CLEC partner to handle the PSTN interference and interconnections. It does this by establishing a Switch Homing Arrangement ("SHA") in which PSTN traffic is delivered to its CLEC partner's TDM facilities and switch for delivery to the Vonage OCN. This arrangement is subject to the provisions of the interconnection agreements between its CLEC partner and the LECs delivering PSTN traffic to its CLEC partner. Vonage, as a non-telecommunications carrier, is not involved in the exchange of TDM traffic. Because Vonage's CLEC partner, like most CLECs, does not reach all parties in a given market, it is essential that the local ILEC support this plan for handling PSTN routing.

In Atlanta and Boston, Vonage was able to implement this plan. AT&T and Verizon are delivering PSTN-originated traffic to the Vonage OCN over existing trunks with Vonage's CLEC partner. Vonage understands that AT&T and Verizon modified their agreements with its CLEC partner to account for this arrangement, and filed these modifications with the relevant state commissions.

CenturyLink, however, has not allowed a similar arrangement in Phoenix. Instead, CenturyLink informed Vonage that it would only exchange traffic with Vonage if Vonage

² Letter from Brita Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97 *et al.*, at 2 (filed October 24, 2013).

³ *See id.*; Letter from Brita Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97 *et al.*, at 2 (filed Sept. 19, 2013).

purchased dedicated TDM trunks in Phoenix and directly entered into a commercial agreement with CenturyLink for the exchange of TDM traffic. That agreement would resemble a 251/252 agreement but, because Vonage is not a carrier, it is our understanding that it would not be filed with the Arizona Corporation Commission. It is Vonage's understanding that CenturyLink's position on establishing a direct relationship is a matter of policy.

Vonage discussed its policy concerns with CenturyLink's position. First, Vonage believes that the arrangement proposed by CenturyLink may be in conflict with the regulatory framework for TDM traffic because the proposed agreement would govern the exchange of TDM traffic—and would therefore largely resemble a Section 251/252 agreement—but it may not be filed with the relevant state commission. Second, Vonage believes such an arrangement represents a step backwards with respect to the Commission's long-term goal of transitioning to all-IP networks. Not only is the expansion of TDM facilities unnecessary and counterproductive, but the agreement CenturyLink has requested would create a disincentive for it to move to IP interconnection. Under CenturyLink's proposal, it would send traffic to Vonage for free, but Vonage would have to pay intercarrier compensation for traffic it sends to CenturyLink. This arrangement would leave CenturyLink with incentives to perpetuate legacy TDM technology, contrary to the Commission's long-term goals.

Vonage informed the Commission that it is not comfortable entering into such a relationship with CenturyLink. As a result, Vonage now plans to port an additional 30,000 numbers in Atlanta and Boston, rather than porting those numbers in Phoenix. The table below reflects Vonage's amended plan:

LATA	Alpha	Beta	Production				
	<i>Success Based</i>	<i>Success Based</i>	<i>Week 1</i>	<i>Week 2</i>	<i>Week 3</i>	<i>Week 4</i>	<i>Week 5</i>
LATA 128	9	20	990	3,433	17,970	4,372	21,936
LATA 438	9	24	993	2,007	16,900	39,833	6,282
LATA 666	9	0	0	0	0	0	0
Total TNs	27	44	1983	5,440	34,870	44,205	28,218
Cumulative – End of Stage Count⁴	27	71	2054	7,494	42,364	86,569	114,787

⁴ The total includes 5,816 inventory numbers not being used to serve an active customer. Vonage migrated some numbers not being used to serve an active customer to allow for growth in rate centers in the Atlanta and Boston LATAs where it will be serving migrated customers but where growth rates in the rates centers were too low to justify requesting a thousand block for the trial. This allowed us to only request a handful of growth codes for the trial.

Ms. Marlene H. Dortch
Federal Communications Commission
October 29, 2013
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If you have any questions or require any additional information, please do not hesitate to contact me at (202) 730-1346.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BS' followed by a stylized flourish.

Brita Strandberg
Counsel to Vonage Holdings Corp.

CC: Bill Dever
Lisa Gelb
Marilyn Jones
Melissa Kinkel
Ann Stevens
Sanford Williams